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February 17, 2006

**VIA HAND DELIVERY**

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Federal Communications Commission  
Office of Secretary

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Office of the Secretary  
236 Massachusetts Avenue, N.E., Suite 110  
Washington, D.C. 20002

Re: Wireless Telecommunications Bureau Request for Comments on CMRS Market  
Competition; WT Docket No. 06-17

Dear Ms. Dortch:

Pursuant to the Wireless Telecommunications Bureau's *Public Notice* of January 18, 2006,<sup>1</sup> Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless"), through its undersigned counsel, hereby submits its comments regarding the Bureau's Eleventh Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services ("*Eleventh Report*").

Specifically, SouthernLINC Wireless urges the Bureau to take into consideration issues regarding the availability of automatic roaming for all mobile wireless services. As the industry continues to consolidate and as consumers increasingly demand nationwide access to mobile wireless services, the availability of automatic roaming has become an increasingly essential component of the competitive CMRS market. The Commission has thus far relied on market forces to ensure the availability of automatic roaming services. However, there is evidence that market forces alone have not been sufficient to ensure the availability of automatic roaming services for all US consumers, leading to reduced competition in the consolidating CMRS market.

In recognition of this problem, the Commission recently initiated a new proceeding on CMRS roaming and has received comments and reply comments from numerous CMRS providers of all sizes.<sup>2</sup> The submissions filed in response to the *CMRS Roaming NPRM* demonstrated the

<sup>1</sup> / "WTB Seeks Comment on CMRS Market Competition," WT Docket No. 06-17, Public Notice, DA 06-62 (rel. Jan. 18, 2006) ("*Public Notice*").

<sup>2</sup> / *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, WT Docket No. 05-265, Notice of Proposed Rulemaking, FCC 05-160 (rel. Aug. 31, 2005) ("*CMRS Roaming NPRM*").

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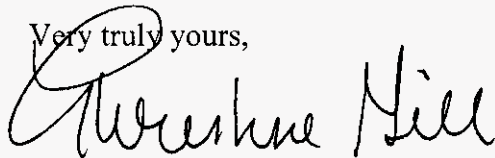
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significance of the Bureau's analysis in its *Tenth Report* on CMRS market competition and the extent to which the issues of automatic roaming and CMRS market competition are intertwined.

In particular, several commenters, including SouthernLINC Wireless, provided reports prepared by leading economists demonstrating the need to reassess the manner in which CMRS markets are defined in order to determine the true level and nature of CMRS competition. Specifically, these comments and reports demonstrate the existence of distinct structural differences between the market for retail CMRS services and the market for wholesale roaming services, thus requiring a different market analysis than the Commission has previously employed.

SouthernLINC Wireless submits that the information and analysis contained in its comments and reply comments, including the accompanying economic reports, have a direct bearing on any assessment or analysis of the state of competition in the CMRS market and are highly relevant to the Bureau's *Eleventh Report*. SouthernLINC Wireless therefore submits for inclusion in this docket, and for the Bureau's consideration, the attached copies of its comments and reply comments in the FCC's separate proceeding on CMRS roaming.

Very truly yours,

A handwritten signature in black ink, appearing to read "Christine M. Gill". The signature is fluid and cursive, with a large initial "C" and "M".

Christine M. Gill

Att.